

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, DC 20007

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

EDWARD A. YORKGITIS, JR.

DIRECT LINE: (202) 342-8540

EMAIL: cyorkgitis@kelleydrye.com

NEW YORK, NY
CHICAGO, IL
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12 November 2019

FILED VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Meeting, GN Docket No. 18-122

Dear Ms. Dortch,

On November 7, 2019, Kris Hutchison and Andrew Roy of Aviation Spectrum Resources, Inc. (“ASRI”), and Edward A. Yorkgitis, Jr., counsel for ASRI, met with Aaron Goldberger, advisor to Chairman Ajit Pai, to discuss the concerns that any new regulatory framework in the 3700-4200 MHz band take appropriate measures to protect aeronautical radio altimeters operating in the adjacent 4200-4400 MHz band. ASRI noted that radio altimeters are a critical safety feature of the vast majority of manned aircraft, including commercial passenger planes, general aviation aircraft, and helicopters.

In the meeting, ASRI explained the ramifications of the recently-filed preliminary test results provided by the Aerospace Vehicle Systems Institute (“AVSI”) regarding the potential for interference to radio altimeters from prospective flexible mobile/fixed operations in the 3700-4200 MHz operations.¹ ASRI also noted that the AVSI testing and analysis is continuing and being refined based on recent discussions of AVSI, ASRI, the Aerospace Industries Association, and numerous other members of the aviation industry with the Commission’s Office of Engineering and Technology (“OET”) on October 23, 2019. ASRI outlined for Mr. Goldberger the highpoints of the discussions with OET.² ASRI also noted that the aviation industry is in contact with the Federal Aviation Administration (“FAA”) regarding these results, and believes the FAA’s involvement in such a proceeding is essential to maintain public safety. The aviation community intends that additional results from the AVSI examination of adjacent band interference into radio altimeters will be provided to the Commission as they become available.

¹ See “Behavior of Radio Altimeters Subject to Out-Of-Band Interference,” attachment to Letter of Dr. David Redman, Aerospace Vehicle Systems Institute, to Marlene H. Dortch, Secretary, Federal Communications Commission, Docket No. 18-122 (filed Oct 22, 2019).

² See also Letter of Edward A. Yorkgitis, Jr., Kelley Drye & Warren LLP, Counsel to ASRI, to Marlene H. Dortch, Secretary, Federal Communications Commission, Docket No. 18-122 (filed Oct 25, 2019) (*ex parte* notice regarding the aviation industry’s October 23 meeting with OET).

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This document is being filed as required by Section 1.1206 of the Commission's rules for inclusion in Docket No. 18-122.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'E. Yorkgitis, Jr.', with a stylized, cursive script.

Edward A. Yorkgitis, Jr.
Counsel for Aviation Spectrum Resources, Inc.

EAY/am

cc: Aaron Goldberger, via email